



Docket No.: 1614.1125

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of:

Kaoru SHIMAMURA

Serial No. 09/785,219

Group Art Unit: 2672

Confirmation No. 3949

Filed: February 20, 2001

Examiner: WANG, JIN-CHENG

For: CHARACTER PROCESSING APPARATUS, CHARACTER PROCESSING SYSTEM,
CHARACTER PROCESSING METHOD AND STORAGE MEDIUM

REPLY BRIEF UNDER 37 CFR § 41.41

Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

Sir:

This Reply Brief is in response to the Examiner's Answer, mailed October 31, 2005, which was in response to Appellant's Appeal Brief filed May 16, 2005. The Appeal Brief appealed the Examiner's June 14, 2004, Office Action finally rejecting claims 1, 3, 5-7, 9-10, 12, 14, 16, 18, and 22-25.

I. STATUS OF CLAIMS

Claims 1, 3, 5-7, 9-10, 12, 14, 16, 18, and 22-25 stand finally rejected and are the subject of this appeal.

II. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Claims 1, 3, 5-7, 9-10, 12, 14, 16, 18, and 22-25 stand rejected under 35 USC 103(a) as being obvious over Kobayashi, U.S. Patent No. 6,522,330, in view of Ooishi, U.S. Patent No. 5,802,538.

III. ARGUMENT IN RESPONSE TO EXAMINER'S ANSWER

The below sequencing of remarks A-G are consistent with Appellants Appeal Brief, and correspond to different rejection rationales for different claims.

However, it is noted that the Examiner's Answer has set forth a completely different sequencing A-G, where sections A- F appear to correspond to Appellant's section A and section G corresponds partially to Appellant's section B. In addition, Appellant's Appeal Brief sections C-G do not appear to be addressed in the Examiner's Answer.

(A) Independent claims 1, 10, and 16 and Dependent claim 3

The Examiner's Answer has presented additional comments explaining the Examiner's rationale for rejecting the independent claims, and in particular the particularly relied upon portions of Kobayashi

Particularly, the Office Action would appear to be primarily relying upon the discussion in col.15, line 63, through col. 16, line 19, of Kobayashi, which states:

"It should be noted that the control section 511 can store a font obtained from the server 1001 as described above in the font storage area 506 as needed. In this case, the control section 511 provides screen displays on the display section 508, and stores the font in the font storage area 506 as needed, for instance, by making the user decide whether the font is to be registered or not. After the font is stored in the font storage area 506, the control section 511 stores the storage address information in correlation to the corresponding character code in the storage address information area 602 in the character information table 504. Thus, by making it possible to add a new font, it is possible to newly add a font for a variant font character which may frequently be used but have a font not stored in the font storage area 506, and thus the processing for displaying a character corresponding to the received character code on a screen is made more efficient.

By the way, in the above description, it is assumed that all fonts are stored in the font storage area 1005 in the server 1001 shown in FIG. 11, but in a case where a portion of the fonts has not been stored in the font storage area 1105, there may occur a case where there is not storage address information corresponding to the character code retrieved in step S1209" (Emphasis Added).

Here, the above emphasized portion of Kobayashi explains an operation of the invention of Kobayahsi when a client 1002 requests a font from the server 1001.

The Examiner, on page 3 of the Reply Brief, further sets forth that "Kobayashi discloses in column 10, that the control section retrieves a matching character code in the information table. In column 11-12, Kobayashi further discloses that the control section decides whether the

character code for a variant font character is to be replaced or whether the character code be stored in the storage section before being transmitted to another character processing apparatus. Replacing the input character code with the representative code, when the character code is not available in the character processing apparatus, also means allocating a code for the requested input by the client. Kobayashi not only teaches using the representative character for replacing the external character unknown to the server 101, but also teaches adding or registering the external character in the storage area. For example, according to Kobayashi's disclosure in column 15-16, Kobayashi discloses that the control section can store a font (store a new font) obtained from the server 1001 ... According to Kobayashi, the new font along with the character code has been added/generated/created for the new font that is originally not available in the look up table of the storage area."

Based on the above recited interpretation of Kobayashi, it is respectfully submitted that there has been a fundamental misunderstanding of both Kobayashi and the claimed invention.

First it is noted that though independent claims set forth in the preamble "[a] character processing apparatus" and Kobayashi uses the same language "a character processing apparatus," the two are not equivalent.

In Kobayashi, the character processing apparatus corresponds to the client 1002.

In the presently claimed invention, the character processing apparatus is connected to the clients, i.e., plurality of input terminals, via a network. Thus, in the presently claimed invention, the "character processing apparatus" cannot be interpreted as being the same as the client 1002.

In addition, as it is unclear how the Examiner is interpreting the claimed plurality of input terminals, i.e., according to the above correspondence with the client 1002 of Kobayashi, or potentially as internal block units within a client 1002 or server 1001 of Kobayashi.

Regardless, only the first interpretation is possible, as the whole of the present application particularly differentiates between input terminals and the claimed character processing apparatus, i.e., as being separate devices connected via a network. See the preamble of claim 1 with such an definition, also noting that the same patentably defines the body of claim 1, for example.

Thus, the second interpretation of the input terminals merely being input devices within a client or within a server is opposite to the definition of the present application.

Accordingly, the claimed input terminal equipments would correspond solely to the clients 1002 of Kobayashi, and the claimed character processing apparatus can only be considered as corresponding to the server 1001 of Kobayashi, or a client acting as a server and performing the required server functions for the particularly claimed required character information.

Thus, each and every element of the server 1001, or client 1002 acting as a server, must correspond to the claimed elements and processes of the claimed character processing apparatus. Similarly, any modification of Kobayashi must similarly meet this requirement.

However, counter to the claimed operation/features of the claimed character processing apparatus, the above cited portions of Kobayashi are referencing the operations of the clients.

In particular, Kobayashi sets forth in col. 13, line 33, through col. 14, line 8, that:

"In FIG. 11, the font storage area 1105 stores therein, different from the font storage area 506 in the character processing apparatus according to Embodiment 1, all of the fonts corresponding to character code for character groups each obtained by classifying the characters into groups for representative characters as well as those for variant font characters.

As the character information table 1103, a table having the same configuration as that of the character information table 504 shown in FIG. 6 is used. However, all of the fonts is stored in the font storage area 1105, consequently, storage address information corresponding to all the character codes for the character code area 601 is stored in the storage address information area 602 of the character information table 1103.

The retrieving section 1104 receives the character code stored once in the work area 1102, retrieves the matching character code from the character information table 1103 according to the received character code, refers to the storage address information corresponding to the retrieved character code, and outputs the storage address information.

The transmission control section 1106 receives the corresponding font from the font storage area 1105 according to the storage address information from the retrieving section 1104 and outputs the font corresponding to the required character code to the client 1002 through the communication control section 1101.

It should be noted that, in the configuration described above, the processing in the retrieving section 1104 as well as in the transmission control section 1106 is realized as a character processing program which is executed by the CPU to function as described above. The control section 1107 corresponds to the CPU in this case.

Also the character processing apparatus according to Embodiment 1 is used for the client 1002. Accordingly, the configuration of the client 1002 is the same as that already described with reference to FIG. 5 and FIG. 6, so that description thereof is omitted herein. However, the client 1002 transmits the received character code to the server 1001, when a character code for any font not stored in the apparatus is received, and receives the corresponding font from the server 1001 to display the font

corresponding to the required character code on the screen."

Thus, as noted above, server's 1001 font storage area 1105, is different from the client's font storage area 506, and similarly, the server's 1001 character information table 1103 is different from the client's 1002 character information table 504, noting that the character information tables include character code areas 601 storing character codes, storage address information areas 602, a type information area 603, and a group information area 604.

The relied upon portions of Kobayashi are directed toward the operation of client 1001 and corresponding character information table 504 and font storage area 506.

Independent claim 1 sets forth:

"[a] character processing apparatus which is connectable to a plurality of input terminal equipments and to a character information creating terminal equipment via a network, comprising:

a receiving section to receive a request for character information which relates to an external character from an arbitrary one of the input terminal equipments;

a code allocating section to allocate a code to the requested character information;

a control section to control creation of character information, based on the requested character information, within the character information creating terminal equipment; and

a setting section to set created character information with respect to the allocated code, so that the created character information is accessible from each of the input terminal equipments."

Thus, here, the character processing apparatus must be connected to the input terminal equipments via a network.

Further, the input terminal equipments would correspond to the client 1002 of Kobayahsi and the claimed character processing apparatus would have to correspond to the server 1001, even to arguably read on the preamble of claim 1.

In addition, even if one client 1002 were 'acting' as a server, e.g., receiving requests for font information/codes, that client would still have to perform the same claimed functions for the same server operations. See independent claim 1 stating "a code allocating section to allocate a code to the requested character information." Thus, even if that client were acting as a server that client still would not perform any allocating of codes for the requested character information.

That client would already include the code information. The clients only allocate codes, based on the Examiner's interpretation of Kobayashi, upon receipt of character information from a

server (or in this case, a client acting as a server).

Thus, as noted above, the Examiner appears to be either mixing features between the client 1002 and the server 1001 of Kobayashi or interpreting the client 1002 of Kobayashi as corresponding to the claimed character processing apparatus.

However, neither approach is correct.

In addition to the above, the Examiner is relying upon the above disclosure of Kobayashi to provide motivation for the proffered modification of Kobayashi, in view of Ooishi.

However, as previously noted, Kobayashi is directed toward reducing the number of required character codes resident in a client's computer memory and overcoming a problem related to fonts and different character variants of Chinese characters, e.g., fonts may only be available for some variants of a Chinese character. "Character groups are divided to groups comprising representative characters and variant font characters. When a variant font character (character code) with a font not stored in the apparatus is inputted, a representative character belonging to the same group is displayed in place of the variant font character on the screen." Kobayashi in col. 2, lines 49-55. A group includes multiple characters having the same meaning and sound, with at least one character being a representative character of the group.

A more detailed discussion of Kobayashi is presented in Appellant's Appeal Brief, and is incorporated herein. In addition, Appellant similarly traverses the Examiner's interpretation of which claimed features are disclosed by Kobayashi, as stated in Appellant's Appeal Brief.

The Examiner proffers that it would have been obvious to modify Kobayashi to make created character information accessible from each of the input terminals.

Again, independent claim 1 sets forth: "a setting section to set created character information with respect to the allocated code, so that the created character information is accessible from each of the input terminal equipments."

The Examiner previously emphasized that the underlying teaching and implementation within Ooishi is not being relied upon, but rather Ooishi is only be used to disclose "distributing the character information over the network." Now the Examiner has stated that the underlying motivation for modifying Kobayashi is set forth in Kobayashi, itself.

Appellants respectfully disagree.

As noted above, if the Examiner is basing the outstanding interpretation of the claimed "character processing apparatus" corresponding to the a client 1002 of Kobayashi acting as a

server, then such a client still would not disclose all the claimed features, including the claimed allocating of codes for "requested character information."

Further, as noted previously, if the Examiner is merely interpreting the claimed "character processing apparatus" as merely corresponding to the client 1002 acting as a client, or the server 1001 acting as a server, then the proffered modification would be counter to the teaching of Kobayashi, which Kobayashi is directed toward simplifying a centralized character information system. Thus, the traversal presented in the Appeal Brief would similarly again be applicable here.

The above arguments are equally applicable to claims 3, 10, and 16.

In addition, as noted above, the Examiner's Answer has set forth a number of traversals A-F, wherein the Examiner has merely restated either the above cited discussion or similar remarks.

Therefore, for at least the above, it is respectfully submitted that Kobayashi fails to disclose all the claimed features proffered in by the examiner. Further, it would not have been obvious to modify Kobayashi as proffered.

Withdrawal of these rejections are respectfully requested.

(B) Independent claims 5, 12, and 18 and Dependent claim 22

Regarding claims 5, 12, and 18, it is further respectfully submitted that the above arguments are equally applicable.

In the Appeal Brief, Appellant pointed out that there are not multiple communications between the client and server. Rather, in Kobayashi, a client 1002 would request a font from a server 1001 and the server 1001 would find the requested font/code and inform the same to the client 1002.

In response to the above, the Examiner has merely again relied upon the client disclosure of Kobayashi, and interprets the same as reading on the claimed multiple communications. In particular the Examiner has emphasized the client's storing of a font obtained from the server 1001, and a notifying of a user of such an action.

However, this does not address the problem with this interpretation of Kobayashi, i.e., that there are not multiple communications for the same requested character information by a server 1001 or a client 1002 acting as a server.

The corresponding portion of claim 5, for example, is within the claimed "character

processing apparatus," i.e., the character processing apparatus must include the claimed first and second notifying sections. Rather, the Examiner is relying on the client as including the notifying sections.

Further, it is not clear how the Examiner is interpreting the claimed notifying of such information from the claimed character processing apparatus to the "input terminal equipments."

As noted above, only the clients in Kobayashi can be interpreted as corresponding to the input terminal equipments, but the Examiner is relying upon a client performing a notification function within itself.

Therefore, withdrawal of this rejection is respectfully requested.

(C)-(G) Independent claims 14 and 20; Dependent claim 6, Dependent claim 7, Dependent claim 9, Dependent claims 23-25

As the Examiner's Answer does not appear to address these remarks presented in Appellant's Appeal Brief, it is respectfully submitted that the same are still applicable and incorporated herein.

IV. CONCLUSION

In view of the above, withdrawal of the outstanding rejections is respectfully requested. It is respectfully submitted that the pending claims are patentably distinguishable over the cited prior art.

Respectfully submitted,

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If any additional fees are required in connection with the filing of this document, please charge Deposit Account No. 19-3935.

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